REMARKS

Reconsideration and allowance of the present claims, based on the following remarks, are respectfully requested.

Claims 9-22 and 25-76 are pending in the present application. Claims 9, 42 and 74 are the independent claims. Claims 75-76 are newly added claims. No new matter has been added.

Rejection under 35 U.S.C. 112

The Office Action rejected Claims 31, 62, and 74 under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement. The Office Action states that these claims recite a microchip with 4 to 1024 processing units, but that the specification lacks sufficient disclosure to enable one of skill in the art to make a microchip with such number of processing units without undue experimentation. Applicant respectfully disagrees. The specification specifically discloses a microchip with 4 to 1024 processing units on page 46, lines 10-18:

> As shown in Figures 10G and 10H, which are parallel to Figures 10E and 10F, the number of PC slave processors 40 can be increased to any . . . other number, such as at least about 4, as shown; the design of the processing system is completely scalar, so that further increases can occur to about eight slave microprocessors 40, about 16, about 32, about 64, about 128, about 256, about 512, about 1024, and so on (there multiples indicated are preferred, not required); the PC master microprocessors 30 can also be increased.

In addition to the specific indication of the processing system being scalar, Applicant notes that those of skill in the art at the time Applicant's application was filed were able to design chips having a large number of processors. See, e.g., Bonneau (U.S. Patent 5,701,507), which issued on December 23, 1997.

Applicant thus submits that Claims 31, 62, and 74 contain subject matter that did enable one skilled in the art to make and/or use the invention.

Rejection under 35 USC 103(a)

The Office Action also rejected Claims 9-22 and 25-74 under 35 USC 103(a) as being unpatentable. Claims 9, 42, and 74 are the pending independent claims. Claim 9 was rejected as unpatentable over Robertazzi further in view of Hortensius, Wade, Regenold, Enmei, Glick, and Besemer. Claims 42 and 74 were rejected for the same reasons. Applicant respectfully traverses these rejections.

As a general note, we point out that the rejection attempts to combine multiple prior art references from vastly different eras in the computer field. In view of the incompatibility of the technology, the particular combination of features from the numerous references would not have been obvious other than through hindsight.

With specific reference to Claim 9, the Office Action states that Claim 9 is unpatentable over Robertazzi in view of Hortensius, Wade, Regenold, Enmie, Glick, and Besemer due to obviousness. In order to establish a prima facie case of obviousness under 35 USC 103(a), the reference(s) must teach or suggest all limitations of the claim. In particular, none of the cited references, taken alone or in combination, teach or suggest the feature of each PC or server including at least one firewall.

The Office Action states that Robertazzi does not teach the PC including a firewall, but that in the similar field of sharing computer resources over a network, Besemer teaches a firewall for regulating access to hardware from another computer.

Applicant disagrees. Besemer does not teach a firewall. Besemer discloses only an architecture and methodology for coupling a multiple number of processing systems in a controlled fashion whereby certain memory resources are shared and certain memory resources are restricted (i.e., not shared), presumably being controlled by corporate IT managers of a global memory module (GMM). See Besemer, column 1, lines 45-60. This does not constitute a firewall as claimed by the Applicant. Besemer was filed in 1978, well before the Internet or

firewalls were utilized. In fact, Besemer does not even mention the words firewall or security. In Besemer, the GMM is used to allocate resources for a system where memory is very limited. Besemer is a pre-Internet embodiment, and seems to have been used in a corporate environment of trusted users, and thus would reside within a corporate network firewall in today's technological environment.

Furthermore, Besemer primarily teaches a GMM which has no processor resources of its own and is therefore neither a server nor a PC as claimed by the Applicant. In fact, Besemer predates by several years the invention of the PC.

As Claims 9, 42, and 74 include the feature of a firewall residing on a PC or a server, these claims are patentable. Claims 10-22, 25-41, 43-73, and 75-76 depend, either directly or indirectly, on Claims 9 and 42, and are thus patentable for the same reasons.

Applicant believes the objections and rejections in the Office Action have been addressed and that the application is now in condition for allowance. The Examiner is invited to contact the undersigned by telephone should the Examiner believe that personal communication will expedite prosecution of this application.

Respectfully submitted,

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